

1 Plaintiffs Twitter, Inc., Apple Inc., AT&T Corp. et al., and Cellco Partnership d/b/a Verizon
2 Wireless and Defendant VoIP-Pal.com, Inc. (collectively, the “Parties”) submit this Joint Statement
3 Regarding a revised Proposed Protective Order.

4 The Parties submit a revised Proposed Protective Order, attached as Exhibit A.¹ The revised
5 Proposed Protective Order conforms with the Court’s October 30, 2020 order resolving the Parties’
6 disputes regarding the Protective Order and adopts the Court’s proposed language defining the scope
7 of the prosecution bar. *See* 5:20-cv-02397-LHK, D.I. 46; 5:20-cv-02460-LHK, D.I. 53; 5:20-cv-
8 02995-LHK, D.I. 53; 5:20-cv-03092-LHK, D.I. 47. The Parties respectfully request that the Court
9 adopt and order the revised Proposed Protective Order (Exhibit A).

10
11 DATED: November 13, 2020

12 By: /s/ Gene W. Lee
Gene W. Lee

13
14 PERKINS COIE LLP
Sarah Fowler (Bar No. 264838)
Amisha Manek (Bar No. 305163)
3150 Porter Drive
Palo Alto, CA 94304
Telephone: (650) 838-4300
SFowler@perkinscoie.com
AManek@perkinscoie.com

15
16
17 PERKINS COIE LLP
Gene W. Lee (admitted *pro hac vice*)
Thomas Matthew (admitted *pro hac vice*)
1155 Avenue of the Americas, 22nd floor
New York, NY 10112
Telephone: (212) 262-6900
GLee@perkinscoie.com
TMatthew@perkinscoie.com

18
19
20
21
22
23
24
25
26
27
28 *Attorneys for Plaintiff Twitter, Inc.*

¹ The Parties also provide a copy of the revised Proposed Protective Order that identifies the changes made in response to the Court’s October 30, 2020 order, attached as Exhibit B.

1 By: /s/ Ameet A. Modi
2 Ameet A. Modi

3 DESMARAIS LLP
4 John M. Desmarais (Bar No. 320875)
5 Ameet A. Modi (Bar No. 331660)
6 Peter C. Magic (Bar No. 278917)
7 101 California Street, Suite 3070
8 San Francisco, CA 94111
9 Telephone: (415) 573-1900
10 Facsimile: (415) 573-1901
11 jdesmarais@desmaraisllp.com
12 amodi@desmaraisllp.com
13 pmagic@desmaraisllp.com

14 DESMARAIS LLP
15 Joze F. Welsh (admitted *pro hac vice*)
16 Raymond N. Habbaz (admitted *pro hac vice*)
17 230 Park Avenue
18 New York, NY 10169
19 Telephone: (212) 351-3400
20 Facsimile: (212) 351-3401
21 jwelsh@desmaraisllp.com
22 rhabbaz@desmaraisllp.com

23 *Attorneys for Plaintiff Apple Inc.*

24 By: /s/ Roger Fulghum
25 Roger Fulghum

26 BAKER BOTTS LLP
27 Sarah J. Guske (Bar No. 232467)
28 101 California Street, Suite 3600
101 California Street, Suite 3600
San Francisco, CA 94111
Telephone: (415) 291-6200
Facsimile: (415) 291-6300
sarah.guske@bakerbotts.com

10 BAKER BOTTS LLP
11 Jon V. Swenson (Bar No. 233054)
12 1001 Page Mill Road Bldg. One, Suite 200
13 Palo Alto, CA 94304
14 Telephone: (650) 739-7500
15 Facsimile: (650) 739-7600
16 jon.swenson@bakerbotts.com

17 BAKER BOTTS LLP
18 Roger Fulghum (admitted *pro hac vice*)
19 910 Louisiana Street
20 Houston, TX 77002
21 Telephone: (713) 229-1707
22 Facsimile: (713) 229-2707
23 roger.fulghum@bakerbotts.com

1 BAKER BOTTS LLP
2 Samir A. Bhavsar (admitted *pro hac vice*)
3 2001 Ross Avenue
4 Dallas, Texas 75201
5 Telephone: (214) 953-6500
6 Facsimile: (214) 953-6503
7 samir.bhavsar@bakerbotts.com

8
9 BAKER BOTTS LLP
10 Lauren J. Dreyer (admitted *pro hac vice*)
11 700 K Street, N.W.
12 Washington, DC 20001
13 Telephone: (202) 639-7700
14 Facsimile: (202) 639-7890
15 lauren.dreyer@bakerbotts.com

16 *Attorneys for Plaintiffs AT&T Corp. et al.*

17 By: /s/ William A. Hector
18 William A. Hector

19 VENABLE LLP
20 Frank C. Cimino, Jr. (admitted *pro hac vice*)
21 Megan S. Woodworth (admitted *pro hac
vice*)
22 600 Massachusetts Ave., NW
23 Washington, D.C. 20001
24 Telephone: (202) 344-4000
25 Facsimile: (202) 344-8300
26 fccimino@venable.com
27 mswoodworth@venable.com

28 VENABLE LLP
1 William A. Hector (Bar No. 298490)
2 101 California Street, Suite 3800
3 San Francisco, CA 94111
4 Telephone: (415) 653-3750
5 Facsimile: (415) 653-3755
6 wahector@venable.com

7 *Attorneys for Plaintiff Cellco Partnership
8 d/b/a Verizon Wireless*

1 By: /s/ Lewis E. Hudnell, III
2 Lewis E. Hudnell, III

3 HUDNELL LAW GROUP P.C.
4 Lewis E. Hudnell, III (Bar. No. 218736)
5 Nicolas S. Gikkas (Bar No. 189452)
6 800 W. El Camino Real Suite 180
7 Mountain View, CA 94040
8 Telephone: (650) 564-3698
9 Facsimile: (347) 772-3034
10 lewis@hudnelllaw.com
11 nick@hudnelllaw.com

12 *Attorneys for Defendant VoIP-Pal.com, Inc.*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories to this document concur in its filing.

DATED: November 13, 2020

/s/ Ameet A. Modi